

EXHIBIT 1

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

**FEMHEALTH USA, INC., d/b/a
CARAFEM,**

Plaintiff,

v.

**RICKEY NELSON WILLIAMS, JR.;
BEVELYN Z. WILLIAMS;
EDMEE CHAVANNES; OPERATION
SAVE AMERICA; JASON STORMS;
CHESTER GALLAGHER; MATTHEW
BROCK; COLEMAN BOYD; FRANK
“BO” LINAM; BRENT BUCKLEY; and
AJ HURLEY**

Defendant.

Civil Action No. _____

DECLARATION OF PAT WHEELER

I, Pat Wheeler, declare the following under 28 U.S.C. § 1746 and penalty of perjury:

1. I am an adult over 18 years of age and have personal knowledge of the facts in this declaration.
2. I am the Director of Security at Femhealth USA, Inc. (d/b/a carafem) in Mt. Juliet, Tennessee. Carafem operates a network of health centers, including one located in Mt. Juliet, Tennessee, that provide a variety of reproductive healthcare services including abortion care; most methods of birth control; and testing for sexually-transmitted infections. In my role as Director of Security Director, I plan for and personally provide surveillance and security services at the health center in Mt. Juliet. I have been in that position since 2014.
3. I have met with officials of the National Abortion Federation (“NAF”) regularly over the last year in order to prepare for the upcoming gathering of Operation Save America

(“OSA”), a Christian fundamentalist anti-abortion group, was planning its annual convention in middle Tennessee. I understand that OSA, and their members, have been involved in clinic protests across the country, including at carafem and Planned Parenthood in Tennessee. Members of OSA, including Chet Gallagher have previously been arrested for trespassing while participating at blockades at carafem. Other members of OSA, including Jason Storms (Director of OSA), Matthew Brock (Assistant Director of OSA), Coleman Boyd, Bo Linham, Brent Buckley, and AJ Hurley are well known for their extensive histories in blockading abortion clinics across the country.

4. In the days leading up to the events, I met frequently with NAF personnel, local police officials, and FBI intelligence analysts in order to establish lines of communication and plans for security over the coming days.

5. As a part of my duties, I frequently interact with members of OSA at the clinic, especially Bo Linham, who is frequently at the clinic, and Chet Gallagher.

6. At carafem, this planning included preparing staff, invasion policy plans, and scheduling.

7. On July 26, 2022, OSA members and affiliates gathered outside carafem’s location at 5002 Crossings Circle in Mt. Juliet, TN. A group of about 150 individuals gathered on the streets and sidewalks in front of the parking lot of the Providence Pavilion medical building (“the medical building”). They held signs depicting graphic images and used megaphones, accosting vehicles entering the parking lot in an attempt to disrupt carafem’s operations.

8. After several hours, a group of approximately seven men, led by defendants Storms and Gallagher, Matthew Brock, Coleman Boyd, Bo Linham, Brent Buckley, and AJ Hurley, crossed the medical building’s property line and entered the parking lot. Storms and Gallagher

approached the front entrance of the building where they were stopped by building security at the sliding glass front doors.

9. Defendants Storms and Gallagher, among the group, refused to move from the front doors and blocked entrance and exit from the building for several minutes.

10. I instructed security staff at carafem to immediately put staff and patients into lockdown procedures due to the imminent threat. Patients and staff were moved to secure location within the suite occupied by carafem. During lockdown no staff or patients were allowed to leave the secure, locked room. Patients and staff remained on lockdown for approximately 30 minutes. I posted at the front door in order to provide deterrence if the group tried to gain entry. While I was at the door, a security guard from the building came and asked if there were any police officers available, as it was becoming unmanageable downstairs at the front doors.

11. Michelle Davidson alerted police personnel about the persons attempting to enter into the medical building.

12. Mt. Juliet Police spoke with defendants Storms and Gallagher, as well as the other men at the front doors of the medical building. Defendants Storms and Gallagher, along with the other men, refused to move from the front entrance to the building. This prevented visitors to the medical building, including carafem patients, from entering the building.

13. After several minutes of insistence by Mt. Juliet Police, Defendants Storms and Gallagher exited medical building property and relocated to the sidewalks, where they resumed their protest activities.

14. The Mt. Juliet Deputy Police Chief Mullins reported to me that the demonstrators with whom he spoke stated that they intended to return to the medical building each day for the

remainder of the week and planned to “escalate” activities and “fill the hallways.” I asked if they intended on blockading the hallways and he indicated that was his understanding.

15. On July 28, 2022, approximately 60 people who I understood to be members or affiliates of OSA, including Defendants Rickey Williams, Bevelyn Williams, and Edmee Chavannes, arrived at the medical building. Like the previous day, these individuals began protest activities on the sidewalks outside the medical building property with graphic signs and megaphones.

16. At approximately 11:20am on July 28, 2022, Defendants Rickey Williams, Bevelyn Williams, and Edmee Chavannes entered into the medical building and proceeded to the second-floor hallway where carafem’s suite is located, though they had no medical or other business purpose in the building. Defendant Bevelyn Williams filmed herself and Defendants Rickey Williams and Edmee Chavannes’ attempts to enter Plaintiff’s clinic and subsequent blocking of the clinic entrance. I recognized these Defendants from prior clinic invasions in Atlanta.

17. Defendants Bevelyn Williams, Rickey Williams, and Edmee Chavannes attempted to enter the clinic by ringing the front desk via an intercom system, pretending to seek services from the clinic.

18. It appears that Defendant Bevelyn Williams was recording the interaction on various social media channels. I have reviewed the video footage, in which she threatens, “Now either they gonna let us in or we take this whole building down. It’s up to them.” She then got even more specific with her threats, stating, “We are trying to see if they let us into the office, into carafem. But if not, we are just going to terrorize this whole building.”¹

¹ <https://twitter.com/MsBevelynBeatty/status/1552690559722016769>.

19. After Defendants approached the door of the clinic, I instructed staff to again initiate lock-down procedures. All clinic staff and patients were moved to secure room within the clinic, where they remained for approximately 35-45 minutes. Clinic personnel called 911 for additional assistance. As I was posted at the front door, I was keenly aware of the danger and very concerned that I would have to use force to protect myself.

20. After they arrived, Mt. Juliet police personnel attempted to remove Defendants Rickey Williams, Bevelyn Williams, and Edmee Chavannes from the hallway for several minutes. Defendants were screaming at the clinic and visitors to the medical building and refusing to comply with the police during this time. Eventually, police personnel escorted the Defendants from the building.

21. After Defendants were removed from the building, I opened the clinic door for a carafem patient arrived at the clinic. She indicated that she had been unable to enter the clinic suite. One patient reported to clinic staff that when Defendants Rickey Williams, Bevelyn Williams, and Edmee Chavannes were in front of the clinic entrance, she had been hiding down the second-floor hallway, around a corner so as to remain unseen and so they could not accost her. The patient was visibly shaken and commented that it was a scary experience. Two other patients that were held in the secure room inside the clinic were also visibly upset. The staff has also experienced increased fear and trepidation throughout the week.

Dated: July 29, 2022

/s/ Pat Wheeler

Pat Wheeler